

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT CHATTANOOGA

FILED

AUG 28 2018

Clerk, U. S. District Court
Eastern District of Tennessee
At Chattanooga

Ronald Jacoway)
)
)
)
)
Name of plaintiff (s))
)
v.)
)
The Travelers Company Inc /dba)
)
Travelers Indemnity dba Travelers Insurance)
)
Alan D Schnitzer, CEO)
)
Name of defendant (s))

Case No. 1:18-cv-200 PLR/SKL
(to be assigned by Clerk)

COMPLAINT

1. A short and plain statement of the grounds for filing this case in federal court (include federal statutes and/or U.S. Constitutional provisions, if you know them):

This is a third party breach of contract claim against (Travelers Personal Injury Insurance Company)
I suffered multiple injuries, during the automobile accident caused by the negligent operation of a motor vehicle by
Anna Joujan, on July 23, 2013 in Chattanooga Tennessee. The policy holder was/is Charles H. Hicks

2. Plaintiff, Ronald Jacoway resides at
1015 Belmeade, Chattanooga
street address city
Hamilton County, TN, 37411, 423-708-1036
county state zip code telephone number

(if more than one plaintiff, provide the same information for each plaintiff below)

3. Defendant, Alan D Schnitzer, CEO lives at, or its business is located at
485 Lexington Avenue, New York,
street address city
NY, 10017
county state zip code

(if more than one defendant, provide the same information for each defendant below)

The Travelers Company Inc.
485 Lexington Avenue
New York, NY 10017
USA

4. Short and plain statement of your claim (state as briefly as possible the facts of your case and how each defendant is involved. You may use additional paper if necessary):

On July 23, 2013, Plaintiff Ronald Jacoway along with a passenger side companion, were driving down Shallowford Road in Chattanooga, Hamilton County, Tennessee. As my companion and I were driving we witnessed a vehicle headed directly towards us. I swerved off-road to avoid the head-on collision, but could not avoid colliding with rock and tree on the side of the road, the collision did cause bodily injury to me and my companion. Anna Joujan was negligent in the following particulars:

a. Anna Joujan failed to use the vehicle with due care for the safety of me and my passenger;

b. Anna Joujan was texting while driving,

c. Anna Joujan simultaneously removed both of her hands from the vehicle's steering wheel.

As a direct and proximate result of the negligence I have suffered serious and permanent injuries and have incurred medical bills and other expenses related to my injuries.

I am entitled to recover damages for pain and suffering, medical bills, loss of enjoyment of life, loss of earning capacity, and all other damages allowed under Tennessee law.

Charles W. Hicks is the owner of the vehicle and the travelers insurance policyholder in the instant case.

5. A demand for judgment for the relief you seek (list what you want the Court to do):

- a. WHEREFORE, Plaintiff, Ronald Jacoway, prays for the following relief:
(1) A judgment for compensatory damages for Ronald Jacoway, against the Defendant in
an amount to be determined by this Honorable Court, but in excess of One Million
- b. (\$ 1,000,000.00) Dollars;
- c. (2) An award of all discretionary costs, court costs, and such other and further relief as
shall be deemed reasonable and necessary.
- d. _____

I (We) hereby certify under penalty of perjury that the above complaint is true to the best of my (our) information, knowledge and belief.

Signed this 8th day of 28, 20 18.

Ronald L. Jacoway

Signature of plaintiff (s)

Business Record Details »

Minnesota Business Name

The Travelers Companies, Inc.

Business Type

Business Corporation (Domestic)

MN Statute

302A

File Number

12-AA

Home Jurisdiction

Minnesota

Filing Date

03/05/1853

Status

Active / In Good Standing

Renewal Due Date

12/31/2018

Registered Office Address

385 Washington Str
St Paul, MN 55102
USA

Number of Shares

1,755,000,000

Registered Agent(s)

(Optional) None provided

Chief Executive Officer

Alan D Schnitzer
485 Lexington Avenue
New York, NY 10017
USA

Principal Executive Office Address

485 Lexington Avenue
New York, NY 10017
USA






















Filing History

Filing History

Select the item(s) you would like to order: **Order Selected Copies**

<input type="checkbox"/>	Filing Date	Filing	Effective Date
<input type="checkbox"/>	03/05/1853	Original Filing - Business Corporation (Domestic)	
<input type="checkbox"/>	03/05/1853	Business Corporation (Domestic) Change of Shares	

<input type="checkbox"/>	Filing Date	Filing	Effective Date
<input type="checkbox"/>	03/05/1853	Business Corporation (Domestic) Business Name (Business Name: St. Paul Fire and Marine Insurance Company)	
<input type="checkbox"/>	03/02/1865	Amendment - Business Corporation (Domestic)	
<input type="checkbox"/>	03/05/1869	Amendment - Business Corporation (Domestic)	
<input type="checkbox"/>	02/13/1872	Amendment - Business Corporation (Domestic)	
<input type="checkbox"/>	03/09/1878	Amendment - Business Corporation (Domestic)	
<input type="checkbox"/>	05/03/1909	Amendment - Business Corporation (Domestic)	
<input type="checkbox"/>	09/27/1909	Amendment - Business Corporation (Domestic)	
<input type="checkbox"/>	07/02/1914	Business Corporation (Domestic) Change of Shares	
<input type="checkbox"/>	5/28/1916	Amendment - Business Corporation (Domestic)	
<input type="checkbox"/>	08/16/1919	Amendment - Business Corporation (Domestic)	
<input type="checkbox"/>	03/25/1920	Amendment - Business Corporation (Domestic)	
<input type="checkbox"/>	11/10/1923	Business Corporation (Domestic) Change of Shares	
<input type="checkbox"/>	01/22/1925	Amendment - Business Corporation (Domestic)	
<input type="checkbox"/>	04/19/1927	Business Corporation (Domestic) Change of Shares	
<input type="checkbox"/>	04/18/1939	Business Corporation (Domestic) Change of Shares	
<input type="checkbox"/>	05/09/1944	Amendment - Business Corporation (Domestic)	
<input type="checkbox"/>	02/10/1950	Amendment - Business Corporation (Domestic)	
<input type="checkbox"/>	04/17/1951	Business Corporation (Domestic) Change of Shares	
<input type="checkbox"/>	11/19/1956	Merger - Business Corporation (Domestic)	
<input type="checkbox"/>	08/22/1957	Business Corporation (Domestic) Change of Shares	
<input type="checkbox"/>	02/18/1958	Amendment - Business Corporation (Domestic)	
<input type="checkbox"/>	02/10/1960	Business Corporation (Domestic) Change of Shares	

	Filing Date	Filing	Effective Date
	01/02/1962	Merger - Business Corporation (Domestic)	
	06/19/1962	Business Corporation (Domestic) Change of Shares	
	11/10/1965	Amendment - Business Corporation (Domestic)	
	12/29/1967	Business Corporation (Domestic) Restated Articles	
	12/29/1967	Business Corporation (Domestic) Business Name (Business Name: The St. Paul Companies, Inc.)	
	02/06/1968	Business Corporation (Domestic) Change of Shares	
	02/06/1968	Business Corporation (Domestic) Change of Shares	
	05/18/1970	Business Corporation (Domestic) Restated Articles	
	05/25/1973	Amendment - Business Corporation (Domestic)	
	12/28/1973	Merger - Business Corporation (Domestic)	
	02/17/1981	Business Corporation (Domestic) Active Status Report	
	05/08/1981	Amendment - Business Corporation (Domestic)	
	05/05/1982	Business Corporation (Domestic) Restated Articles	
	03/01/1983	Merger - Business Corporation (Domestic)	
	03/18/1986	Consent to Use of Name - Business Corporation (Domestic)	
	05/09/1986	Business Corporation (Domestic) Change of Shares	
	12/30/1986	Merger - Business Corporation (Domestic)	
	05/08/1987	Amendment - Business Corporation (Domestic)	
	01/24/1990	Business Corporation (Domestic) Other	
	05/17/1994	Business Corporation (Domestic) Change of Shares	
	05/15/1995	Business Corporation (Domestic) Other	
	05/06/1998	Business Corporation (Domestic) Change of Shares	

	Filing Date	Filing	Effective Date
	04/14/2000	Registered Office and/or Agent - Business Corporation (Domestic)	
	11/14/2003	Amendment - Business Corporation (Domestic)	
	04/01/2004	Business Corporation (Domestic) Business Name (Business Name: The St. Paul Travelers Companies, Inc.)	
	04/01/2004	Registered Office and/or Agent - Business Corporation (Domestic)	
	04/01/2004	Business Corporation (Domestic) Change of Shares	
	04/01/2004	Business Corporation (Domestic) Restated Articles	
	12/28/2005	Merger - Business Corporation (Domestic)	
	02/26/2007	Business Corporation (Domestic) Business Name (Business Name: The Travelers Companies, Inc.)	
	05/02/2007	Business Corporation (Domestic) Restated Articles	
	08/04/2011	Amendment - Business Corporation (Domestic)	
	08/04/2011	Business Corporation (Domestic) Restated Articles	
	5/22/2013	Amendment - Business Corporation (Domestic) Change of Shares	
	5/23/2013	Amendment - Business Corporation (Domestic) Restated Articles	

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